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**PACIFIC X TELESIS**  
Group - Washington

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**JUL 30 1993**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**July 30, 1993**

**William F. Caton**  
**Acting Secretary**  
**Federal Communications Commission**  
**Mail Stop 1170**  
**1919 M Street, N.W., Room 222**  
**Washington, D.C. 20554**

**Dear Mr. Caton:**

**Re: *PR Docket No. 92-235 - Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them***

**On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Reply Comments" in the above proceeding.**

**Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.**

**Sincerely,**

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

JUL 30 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Replacement of Part 90 by Part 88 to )  
Revise the Private Land Mobile Radio )  
Services and Modify the Policies )  
Governing Them )

PR Docket No. 92-235

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell (the "Pacific Companies")  
strongly support five of the positions made in various comments:

- 1) That wireline telephone common carriers should be eligible to hold Specialized Mobile Radio Systems ("SMRS") licenses;
- 2) That the Commission should postpone or otherwise extend the deadline for migration to narrowband technology;
- 3) That the proposed ERP/HAAT limitations should not be adopted;
- 4) That the Commission should proceed with the implementation of exclusive channel assignments; and
- 5) That there should be a Public Service user category which encompasses critical services providers, including public utilities.

SMRS ELIGIBILITY.

The Pacific Companies enthusiastically support the position ably expressed by BellSouth (passim), Southwestern Bell Corporation (passim), and GTE (pp. 4-5) who appeal to the Commission to lift the restrictions on wireline common carrier

eligibility for SMRS ownership and innovative shared use narrowband SMR systems.

Wireline common carriers, by virtue of their customer focused communications design, construction and operation experience, and human and financial resources, are ideally suited to provide a wide array of SMR services. The restrictions proposed in 88.17 and 88.1005 limit and exclude one of the industry's most experienced, capable, and resource-rich group of communications providers - wireline common carriers. Arbitrarily foreclosing them from becoming active participants in this radio communications field does the public interest no service at all.

Freeing wireline common carriers is a simple, cost-free way for the Commission to promote the efficient use of the spectrum. This open eligibility will encourage new ideas from new (but not inexperienced) service providers to contribute diverse service concepts leading to the emergence of optimum spectral efficiency.

NARROWBAND CHANNELS AND NEW TECHNICAL AND OPERATIONAL STANDARDS.

Two of the proposed technical changes concern us:

- 1) The proposed deadline for migration to the new 12.5 KHz channels, especially in light of the proposed 0.1 PPM frequency stability standard; and
- 2) The Height Above Average Terrain (HAAT), proposal.

schedule to 12.5 and 6.25 KHz channels. There is no doubt that this channelization plan is appropriate, but the deadline for the transition is simply too short to allow for the reasonable recovery of embedded investment. Bell Atlantic estimates a cost of \$21 million to effect the required transition. The Pacific Companies are more fortunate because much of our recently purchased equipment is convertible to 12.5 KHz operation. That means we could make the first phase transition to 12.5 KHz operation for approximately \$770,000. But this does not include the adoption of the proposed 0.1 PPM stability requirement. To the best of our knowledge no mobile radios presently available can achieve such an objective. Were it available, the cost to the Pacific Companies to convert our 6,000 mobiles and 150 repeaters is estimated to be \$13.3 million.

As a result of an aggressive modernization program, well over seventy percent of Pacific's mobile radio equipment is under two years old. To require its retirement and replacement by January 1, 1996, would represent a serious and punitive cost burden to our companies. We propose a schedule that: 1) requires all systems licensed after December 31, 1993, to employ 12.5 KHz channelization (with presently available frequency stability performance); and 2) transition of all systems to 6.25 KHz channelization by the year 2004. This would provide adequate time to properly develop the required radio equipment and would allow present users the opportunity to employ recently installed systems over a reasonable investment lifetime.

The Pacific Companies, in serving the telecommunications needs of the vast majority of subscribers in one of our nation's largest states, in addition to a large portion of the state of Nevada, has a daily need to dispatch and communicate with 6,000+ installation, repair, and construction vehicles. To this end we have designed an efficient, 150 repeater, wide area TMRS radio system, some repeaters of which have a service radius of 80 to 100 miles. For example, our Joaquin Ridge site at 3,600 feet overlooks the California San Joaquin Valley and has an operational radius of about eighty miles.

In order to conform to the proposed ERP/HAAT standards, the Pacific Companies would be forced to build an estimated 300 additional repeaters at a capital cost of approximately \$22.5 million. The Joaquin Ridge site demonstrates the effect of the proposal. It would take about a dozen transmitters, each with a 25 mile radius, to get the same coverage the one transmitter currently gets. We ask the Commission to consider the radio users who require wide area systems and to craft rules which accommodate those users' special needs.

#### EXCLUSIVE CHANNEL ASSIGNMENTS.

We join with GTE (p. 4), in supporting channel exclusivity. This would indeed create a powerful incentive to promote spectrum efficiency. Exclusivity promotes long range planning, confident capital investment, and ease of engineering. For these reasons, we encourage rules which would permit exclusive channel assignment in most of the 150-174 MHz, and 450-470 MHz bands.

#### USER GROUP CONSOLIDATION.

We agree that there are currently too many user groups, or pools, and that the number should be reduced. The proposal in the Joint Comments of the Industrial Telecommunications Association, Inc., Council on Independent Communication Suppliers and Telephone Maintenance Frequency Advisory Committee ("Joint Comments") is prudent. The Joint Commenters recommend a fourth "Public Service" pool for private industrial users (p. 22).

The FCC's proposed "non-commercial" pool is too broad, aggregating users for whom radio communication is essential with

who do not, just as the Commission has wisely created a group for Public Safety Radio Service. The membership of this "Public Service" pool would consist of specific users, such as utilities, who, by the nature of their business, broadly serve the public welfare.

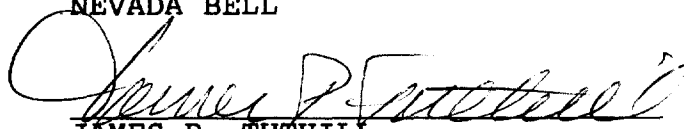
#### CONCLUSION.

The Pacific Companies commend the Commission and its staff for confronting the formidable task of rewriting Part 90 of its rules. We urge the Commission to open SMR eligibility to all would-be participants. Open policies promote the public interest. We also strongly endorse Bell Atlantic's concerns

regarding narrowband technology and ERP/HAAT limitations. In this regard, the Commission should 1) extend the conversion period; and 2) abandon the proposed ERP/HAAT standards. Finally, we favor channel exclusivity and the creation of a public service user pool for entities which clearly promote the public welfare.

Respectfully submitted,

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NEVADA BELL



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Date: July 30, 1993



CERTIFICATE OF SERVICE

I, Alex Kositsky, certify that the following is true and correct:


I am a citizen of the United States, State of California and over eighteen years of age.

My business address is 140 New Montgomery Street, San Francisco, CA 94105.

On July 30, 1993, I served the attached "Reply Comments of Pacific Bell and Nevada Bell" by placing true copies thereof in envelopes addressed to the parties in the attached list which envelopes, with postage thereon fully prepaid. I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

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By: \_\_\_\_\_



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